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17 Attorneys for Plaintiffs

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 SAN FRANCISCO DIVISION

21 In re FACEBOOK BIOMETRIC) Master File No. 3:15-cv-03747-JD
INFORMATION PRIVACY LITIGATION)
22 _____) CLASS ACTION
23 This Document Relates To:) DECLARATION OF SHAWN A.
24 ALL ACTIONS.) WILLIAMS IN SUPPORT OF PLAINTIFFS'
25 _____) MOTION TO EXCLUDE THE TESTIMONY
OF DEFENDANTS' PROPOSED EXPERT
MATTHEW TURK, PH.D.

26 [REDACTED]

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1 I, Shawn A. Williams, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California and before this District Court. I am a member of the law firm Robbins Geller Rudman &
4 Dowd LLP, counsel of record for plaintiffs in the above-entitled action. I make this Declaration in
5 Support of Plaintiffs' Motion to Exclude the Testimony of Defendant's Proposed Expert Matthew
6 Turk, Ph.D. I have personal knowledge of the matters stated herein and, if called upon, I could and
7 would competently testify hereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit 1:

[REDACTED] [FILED UNDER
10 SEAL];

11 Exhibit 2:

[REDACTED] [FILED
12 UNDER SEAL];

13 Exhibit 3:

[REDACTED] [FILED
14 UNDER SEAL];

15 Exhibit 4:

[REDACTED] [FILED UNDER SEAL];

16 Exhibit 5:

“DeepFace: Closing the Gap to Human-Level Performance in Face
17 Verification” by Yaniv Taigman *et al.* (Bates No. FBBIPA_00001214-
18 FBBIPA_00001221);

19 Exhibit 6:

“Submission by ‘Facebook Ireland Ltd’ to the Office of the Irish Data
20 Protection Commissioner: Response to Complaint(s) Number: 9,” received
September 30, 2013;

21 Exhibit 7:

[REDACTED] [FILED UNDER SEAL];

22 Exhibit 8:

[REDACTED] [FILED UNDER SEAL];

23 Exhibit 9:

[REDACTED] [FILED UNDER SEAL];

24 Exhibit 10:

“Facebook turns off automatic facial recognition feature for all European
25 users in victory for privacy campaigners,” DailyMail.com, dated October 16,
2012; and

26 Exhibit 11:

[REDACTED] [FILED UNDER SEAL].

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed this 16th day of March, 2018, at San Francisco, California.

3 s/ Shawn A. Williams

4 SHAWN A. WILLIAMS

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